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December 17, 1997

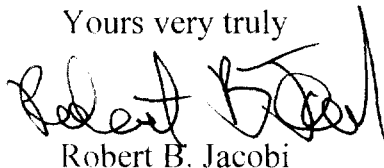
VIA HAND DELIVERY

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

Dear Ms. Salas

On behalf of Golden Orange Broadcasting Co., Inc., licensee of television station KDOC, Anaheim, California, there are herewith transmitted an original and nine copies of its "Comments of Golden Orange Broadcasting on MSTV Ex Parte Submission."

Yours very truly

  
Robert B. Jacobi

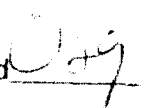
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Enclosures

cc: Mr. Robert Eckert

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BEFORE THE

# Federal Communications Commission

In the Matter of )  
 )  
Advanced Television Systems and Their )  
Impact Upon the Existing Television ) MM Docket No. 87-268  
Broadcast Service )

TO: The Commission

## COMMENTS OF GOLDEN ORANGE BROADCASTING ON MSTV EX PARTE SUBMISSION

The Association for Maximum Service Television, Inc. and Other Broadcasters (hereinafter "MSTV"), on November 20, 1997, filed a document entitled "Ex Parte Submission Based on New Technical Discoveries to Help the Commission Improve the DTV Table of Allotments/Assignments." By Public Notice dated December 2, 1997, the FCC announced that it was soliciting Comments on the MSTV Submission. On behalf of Golden Orange Broadcasting Co., Inc., licensee of television station KDOC, Channel 56, Anaheim, California (hereinafter "Golden Orange" or "KDOC"), there is herewith submitted its Comments.

1. The MSTV proposals do not represent full industry agreement. While MSTV members and other broadcasters may derive benefits, the MSTV Submission ignores needs of individual licensees, particularly with respect to channel changes set forth in the revised Table of Allocations for stations in the Los Angeles market area. In this respect, Golden Orange submits that the issues raised by MSTV should be considered on an

individual case-by-case basis. Moreover, Golden Orange submits that the type of issues raised by MSTV should be resolved by the Federal Communications Commission, and not by an industry group dominated by major entities who predictably will attempt to further their own vested interest. In short, the Federal Communications Commission is the most appropriate forum to assure the resolution of issues based upon the public interest -- not private interests.

2. Golden Orange acknowledges that the MSTV Submission contains "Improvements" which are meritorious and worthy of consideration. The fact, however, that Improvements can be achieved does not justify the unfettered reallocation of DTV channels in the Los Angeles market primarily for the benefit of VHF licensees and totally devoid of consideration for the needs of those licensees which would be adversely affected by the MSTV revised Table of Allocations. The MSTV Submission is couched in terms of "assisting" the Commission. The altruistic objective of "assisting" is in fact intermixed with MSTV self-serving objectives. In evaluating the Improvements, it is incumbent upon the Commission to properly distinguish between these objectives.

3. The Sixth Report and Order allotted DTV Channel 32 to Golden Orange, an allocation which will permit Golden Orange to provide an acceptable signal throughout its coverage area. The MSTV revised Table of Allocations proposes DTV Channel 55 for Golden Orange -- the same channel suggested by MSTV in its initial 1995 proposal. The transmitter site for the KDOC Channel 56 NTSC facility is Sunset Ridge; the transmitter site for most of the Los Angeles area stations is Mt. Wilson. Because of terrain and antenna orientation problems, the KDOC Channel 56 signal is not received within large portions of the station's city of license, the Grade A and the Grade B contours.<sup>1/</sup> Operation

---

<sup>1/</sup> Attached hereto as Appendix 1 is an Arbitron study and a subsequent analysis which reflects that 80% of the non-cable homes do not receive an acceptable picture from KDOC.

of DTV channel 55 from Sunset Ridge will merely repeat the problems now experienced by KDOC on NTSC channel 56.

4. To overcome the problem of not providing an acceptable signal to 80% of the non-cable homes within its theoretical protected contour, Golden Orange plans to operate its digital television station from the Mt. Wilson area. A Channel 32 operation from Mt. Wilson will comport with the Commission's rules and will enable Golden Orange to provide an acceptable signal within its coverage area -- a signal quality which is not now provided by NTSC Channel 56 operating from Sunset Ridge and would not be provided by DTV Channel 55 operating from Sunset Ridge. Moreover, simultaneous operation on DTV Channel 55 from the Mt. Wilson and on NTSC Channel 56 at Sunset Ridge is not technically feasible (see Engineering Statement, Appendix II). In proposing DTV Channel 55, MSTV ignores the public interest benefits to be derived from KDOC providing an acceptable signal throughout its coverage area in order to accommodate VHF licensees with less desirable FCC allotments in the 60-69 band.<sup>2/</sup>

5. Golden Orange supports the Channel 32 allocation set forth in the Sixth Report and Order. The primary objective of Golden Orange is to operate from Mt. Wilson in order to provide an acceptable signal within its entire coverage area; Golden Orange recognizes, however, that other alternative nonadjacent channels within the core spectrum proposed in the MSTV Table will also "work." Under the MSTV proposal, however, these core spectrum channel alternatives are proposed for Los Angeles VHF stations which now provide an acceptable NTSC signal to most (if not all) of their respective coverage areas and will continue to do so during the transition stage. These channels are as follows:

---

<sup>2/</sup> In 1995, shortly after the filing of the MSTV initial Submission to the FCC which proposed DTV Channel 55 for Golden Orange, Golden Orange's principals met in Washington, D.C. with the MSTV Director of Engineering. At that time, MSTV was informed of the existent KDOC coverage problem and the reason for seeking a nonadjacent DTV allocation which would operate from Mt. Wilson.

Channel 23 (rather than FCC Channel 60) for KCBS (Ch. 2);

Channel 41 (rather than FCC Channel 68) for KTLA (Ch. 5);

Channel 38 (rather than FCC Channel 65) for KTTV (Ch. 11);

Channel 33 (rather than FCC Channel 66) for KCOP (Ch. 13).

While any of these core spectrum proposed DTV allocations would have met the needs of Golden Orange (see Engineering Statement, Appendix II), the "bottom line" is that Golden Orange was not a member of the "Club."

6. If the Commission is disposed to consider the MSTV revised Table of Allocations for the Los Angeles market, the Commission should ensure that Golden Orange continues to receive a DTV allotment which will work from the Mt. Wilson area simultaneously with the Golden Orange NTSC operation from Sunset Ridge. In addition to the core channels referenced supra, the attached Engineering Statement (Appendix II) demonstrates that DTV Channel 26 also can be utilized by Golden Orange from Mt. Wilson consistent with the MSTV revised Table of Allocations.

7. There is a further reason for the Commission to reject the MSTV Channel 55 proposal for Golden Orange. Golden Orange operates on NTSC Channel 56 -- a channel that will not be a part of the core spectrum. Consequently, Golden Orange will not have an option to return to DTV Channel 56 upon the termination of the transition time period. Conversely, the Los Angeles area licensees operating on channels 2-46 will have the option to return to their original channels. Indeed, all of the VHF licensees reasonably and

logically can be expected to return to VHF DTV channel facilities.<sup>3/</sup> In this posture, stations operating on NTSC channels outside of the core spectrum (such as KDOC) are more likely to accept the transitional core channel as the permanent DTV allocation -- because of viewer identity achieved during the transition period and in order to avoid the cost of a second channel move. Moreover, the public interest would be better served by establishing channel continuity rather than sanctioning channel changes motivated by private interests. Equitable and public interest considerations mandate that any licensee operating on an NTSC channel outside of the core should receive a DTV transitional core channel.

The Commission's NPRM and Sixth Report and Order both proposed core channels for Station KDOC. Consequently, until the Commission invited Comments on the MSTV Submission, Golden Orange believed that the shortcomings of its NTSC Channel 56 operation would be remedied by its proposed DTV operation from a Mt. Wilson site. Golden Orange continues to favor a Channel 32 DTV allocation. If the Commission revises the channel allocations for the Los Angeles area stations, Golden Orange is entitled to a core spectrum allocation consistent with operation from the Mt. Wilson area.

Respectfully submitted,

GOLDEN ORANGE BROADCASTING CO., INC.

By: 

Robert B. Jacobi  
COHN AND MARKS  
1333 New Hampshire Avenue, N.W.  
Suite 600  
Washington, D.C. 20036-1573  
(202) 293-3860

Its Attorneys

Date: December 17, 1997

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<sup>3/</sup> Operational costs, coverage, channel continuity, viewer identity are some of the more salient reasons guaranteeing the return to DTV broadcast operations on DTV channels 2 through 13.

**APPENDIX I**

***ARBITRON STUDY AND SUBSEQUENT ANALYSIS***

GARY LITAKER  
MEDIA RESEARCH  
1801 West 263rd Street  
Lomita, California 90717  
(213) 539-5628 / 326-2686

July 24, 1990

Mr. Calvin Brack  
KDOC-TV  
1730 South Clementine  
Anaheim, California 92802

Dear Cal:

Accompanying this letter is the final summary and report on the various research undertaken to determine the reception and viewing of KDOC in the Los Angeles television market.

From the research, the following points are significant:

1. In two different samples of viewing in the Los Angeles market, 80% of the non-cable television households report they do not receive KDOC.
2. Of the non-cable television households that can receive KDOC, 46.7% report they view the station.
3. Currently, in order to receive the KDOC signal, it appears as if household antennas must be adjusted to receive an acceptable picture. With the exception of indoor antennas, the adjustment on the most-used antenna system (roof) is inconvenient for most households.

From the above, the following conclusions are apparent:

1. The inability of 80% of the non-cable homes in the Los Angeles market to receive an acceptable picture from KDOC is in direct relationship to KDOC's low audience levels.
2. Based on the fact that homes that can receive KDOC view the station in substantial percentages, any improvement in the able-to-receive households would increase the KDOC viewing audience and thus make the station a more marketable entity to major advertisers.

Sincerely,



(1)

ANALYSIS - CAN RECEIVE/DID VIEW STUDY  
MAY 1989 ARBITRON

This study indicates, as expected, some areas of serious concern for KDOC.

Overview

First, there are homes who view KDOC that are not reporting that viewing. Comparing the May 1989 report (meter driven) to the can receive/did view study (diary driven) reveals the following:

May 1989 Report

|                       |                  |                            |
|-----------------------|------------------|----------------------------|
| ADI Television Homes  | <u>4,807,700</u> |                            |
| KDOC Weekly Net Homes | 688,000          | = 14.3% viewing<br>to KDOC |

Can Receive/Did View Study

|                      |              |                           |
|----------------------|--------------|---------------------------|
| Total In-Tab Diaries | <u>1,623</u> |                           |
| Homes Viewing KDOC   | 106          | = 6.5% viewing<br>to KDOC |

This disparity indicates that viewers, even though watching the station, are apparently not indicating their viewing in the diaries. This will not influence the station's ratings, but will result in lower demographics being credited to the station.

In order to counter this, I would again like to suggest that KDOC, beginning in with the October survey, air an announcement that states:

"If you are keeping a rating diary, please indicate you are watching KDOC, Los Angeles."

(2)

This is technically against Arbitron and Nielsen policy and it will result in a notice in the report stating that KDOC made the announcement. However, it will not result in de-listing in the report. Stations all over the U.S. do this and it certainly will not harm the audience levels currently being delivered.

Second, as bleak as this study appears on the surface, there are some definite signs that the major problem the station is encountering is the ability of homes to receive the station's signal.

The homes that indicated they could receive the station and did view was 39.1%. This is a far cry from the 6.5% did view figure from all of the diaries in the survey.

The above seems to be an indication that KDOC's viewing universe is limited to only a portion of the Los Angeles ADI. What viewing it does attract is therefore coming from a smaller pool of the market's homes than the competing stations.

Based on the data received from Arbitron, KDOC's signal (can receive homes) is apparently good in Orange County and the southern and central portions of Los Angeles County. However, it appears as if much of the San Fernando Valley and areas to the northwest are unable to receive the station.

The unable-to-receive areas are partially covered by cable. But KDOC receives less viewing in cable homes than in non-cable homes. Therefore, increasing KDOC's acceptance by cable systems, while important now and even more so in the future, is only part of the solution. The over-the-air signal remains the most viable and solvable part of the problem.

3

Page 3

Initial Recommendations for Immediate Action

1. Conduct a second study on the July 1989 Arbitron to see if the same can-receive patterns appear in both cable and non-cable homes.
2. If a second study generally confirms the patterns found in the first, it would seem logical that the finds are relevant and at that point steps to correct the signal problem can be addressed.
3. Undertake a study to find out which cable companies are not carrying KDOC and the areas they serve. The concentration would be in cable companies which serve areas in which KDOC cannot be received over-the-air.

(A)

ANALYSIS - RECEIVE AND DID VIEW

The data on the following chart is an overview of the can receive homes and of those homes, the percentage that did view. This combines both cable and non-cable homes in order to look at the situation overall.

The study indicates that in homes that can receive KDOC, the viewing is considerably more than the overall figures indicate.

In order to produce a more realistic figure, even if Riverside West and San Bernardino counties are eliminated (due to low diary data), KDOC viewing among homes that can receive the station is still 39.0%.

What this seems to indicate is that if the KDOC signal (via over-the-air or cable) was being received in more homes, viewing would increase significantly. Able-to-receive the station seems to be a major problem in a large number of households.

RECEIVE AND DID VIEW BY COUNTY

|                  | <u>Total<br/>Diaries</u> | <u>Can<br/>Receive</u> | <u>%</u> | <u>Did<br/>View</u> | <u>% (of those <i>receiving</i><br/>who can receive)</u> |
|------------------|--------------------------|------------------------|----------|---------------------|--|
| Los Angeles      | 993                      | 174                    | 17.5%    | 74                  | 42.5%  |
| Orange           | 305                      | 67                     | 30.0     | 20                  | 29.9   |
| San Bernardino   | 136                      | 19                     | 14.0     | 5                   | 26.3   |
| Riverside (West) | 90                       | 11                     | 12.2     | 7                   | 63.6   |
| Ventura          | 82                       | -                      | -        | -                   | -  |
| Kern             | 14                       | -                      | -        | -                   | -  |
| Inyo             | 3                        | -                      | -        | -                   | -  |
| Totals           | 1,623                    | 271                    | 16.7%    | 106                 | 39.1%  |

*Connecticut 83.3%*

Source: May 1989 Arbitron special study.

(5)

(6)

ANALYSIS - COUNTY-BY-COUNTY DETAIL

The county-by-county detail indicates can receive/did view between cable and non-cable homes. The percentages below these figures refer to those that can receive/did view among the cable homes only or can receive/did view among the non-cable homes only, not to the total diaries.

Note that can receive non-cable homes out-number can receive cable homes.

Can receive may be somewhat subjective in this case. If a home is cable-equipped, it may not choose to view over-the-air programming, relying exclusively on the cable; therefore, if a home is cable-equipped and the system does not carry KDOC, the home would indicate an unable to receive, even though it might be able to receive KDOC over the air. Logic indicates this is a small number, but it may a part of the whole.

Additionally, KDOC viewing among non-cable homes is higher than among cable homes. A supposition for this could possibly be that since non-cable homes have a smaller selection of station choices, KDOC may be receiving a benefit that is not apparent in cable homes.

2

COUNTY-BY-COUNTY DETAIL  
CAN RECEIVE/DID VIEW STUDY  
MAY 1989 ARBITRON

| <u>COUNTY</u>                      | <u>TOTAL<br/>DIARIES</u> | <u>CABLE HOMES</u> |                    |                 | <u>NON-CABLE HOMES</u> |                    |                 |
|------------------------------------|--------------------------|--------------------|--------------------|-----------------|------------------------|--------------------|-----------------|
|                                    |                          | <u>Diaries</u>     | <u>Can Receive</u> | <u>Did View</u> | <u>Diaries</u>         | <u>Can Receive</u> | <u>Did View</u> |
| <u>Los Angeles</u><br>% (see note) | 993                      | 389                | 67<br>17.2%        | 27<br>6.9%      | 604                    | 107<br>17.7%       | 47<br>7.8%      |
| <u>Orange</u><br>%                 | 305                      | 171                | 33<br>19.3%        | 10<br>5.8%      | 134                    | 34<br>25.4%        | 10<br>7.5%      |
| <u>San Bernardino</u><br>%         | 136                      | 79                 | 6<br>7.6%          | 1<br>1.3%       | 57                     | 13<br>22.8%        | 4<br>7.0%       |
| <u>Riverside W.</u><br>%           | 90                       | 44                 | 3<br>6.8%          | 0<br>-          | 46                     | 8<br>17.4%         | 7<br>15.2%      |
| <u>Ventura</u><br>%                | 82                       | 61                 | 0<br>-             | 0<br>-          | 21                     | 0<br>-             | 0<br>-          |
| <u>Kern</u><br>%                   | 14                       | 8                  | 0<br>-             | 0<br>-          | 6                      | 0<br>-             | 0<br>-          |
| <u>Inyo</u>                        | 3                        | -                  | -                  | -               | -                      | -                  | -               |

Note: percentages refer to cable and non-cable homes only, not percentages of total diaries.

### PROJECTION OF POTENTIAL AUDIENCE INCREASES

Assuming that the reason for KDOC's low able-to-receive levels can be found and solved, the result would be to increase the potential KDOC viewing audience in Los Angeles. As an example of how these levels would change, the audience currently attained by KCET (detailed earlier in this report) can serve as a model for the projected KDOC increase.

In calculating this estimation, the following has been taken into consideration:

1. KDOC's cable households would remain the same;
2. KDOC's able-to-receive non-cable audience increases would occur in Los Angeles, Orange, San Bernardino and Riverside counties.

However, since Los Angeles rating reports are based on all of the television homes in the Los Angeles ADI, KDOC's percentage of estimated audience delivery is based on the total television homes in the market (4,939,700 in 1989-90) and not only those in the four-county area in which the KDOC able-to-receive homes are concentrated.

Additionally, one technical factor that is not addressed is the differences in antenna location and type as well as the in transmitter power between KDOC and KCET. However, for the purposes of comparison, it is assumed that KDOC can eventually equal KCET in the number of non-cable homes able to receive an acceptable signal.



CURRENT ABLE-TO-RECEIVE CAPABILITIES - KDOC/KCET

The following chart is based on diaries tabulated from all counties representing the Los Angeles ADI with homes projected to 1989-90 levels.

| <u>Can Receive</u>           | <u>KDOC</u>     | <u>KCET*</u>      |
|------------------------------|-----------------|-------------------|
| Total Non-Cable/Cable Homes: | 864,400 (17.5%) | 2,450,100 (49.6%) |
| Non-Cable**                  | 513,700 (10.4%) | 1,249,700 (25.3%) |
| Cable**                      | 350,700 ( 7.1%) | 1,200,400 (24.3%) |

If KDOC's signal were to equal that of KCET's among non-cable homes, KDOC's able-to-receive data would change to the following:

|                       |                            |
|-----------------------|----------------------------|
| KDOC Able to Receive: |                            |
| Non-Cable Homes       | 1,249,700 (-736,000 homes) |
| Cable Homes           | <u>350,700 (no change)</u> |
| TOTAL                 | 1,600,700                  |

This is equal to 32.4% of all Los Angeles television households.

\*July survey only.

\*\*Projected from diary returns from all homes in Los Angeles ADI.

THE EFFECT OF INCREASED ABLE-TO-RECEIVE ON THE KDOC VIEWING AUDIENCE

Increasing KDOC's able-to-receive households would logically add to the KDOC viewing audience.

According to the May and July diary analysis used as the basis for the above information, KDOC is viewed by 45.4% of all of its able-to-receive homes. Translating this data to the projected increase in KDOC's able-to-receive households produces the following estimates:

| <u>Estimated Increased</u><br><u>Able-To-Receive</u> | <u>Current</u><br><u>Did View</u> | <u>Able-To-Receive</u><br><u>Homes Viewing</u> |
|--|-----------------------------------|--|
| 1,600,400  | 45.4%                             | 726,600  |

This represents an increase of 392,400 new view viewing households over KDOC's current level.

(1)

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③

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| Kern             | 14                       | -                      | -        | -                   | -  |
| Inyo             | 3                        | -                      | -        | -                   | -  |
| Totals           | 1,623                    | 271                    | 16.7%    | 106                 | 39.1%  |

*Cannot Receive 83.3%*

Source: May 1989 Arbitron special study.

5

⑥

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(2)

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CAN RECEIVE/DID VIEW STUDY  
MAY 1989 ARBITRON

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|                                    |                          | <u>Diaries</u>     | <u>Can Receive</u> | <u>Did View</u> | <u>Diaries</u>         | <u>Can Receive</u> | <u>Did View</u> |
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| <u>Orange</u><br>%                 | 305                      | 171                | 33<br>19.3%        | 10<br>5.8%      | 134                    | 34<br>25.4%        | 10<br>7.5%      |
| <u>San Bernardino</u><br>%         | 136                      | 79                 | 6<br>7.6%          | 1<br>1.3%       | 57                     | 13<br>22.8%        | 4<br>7.0%       |
| <u>Riverside W.</u><br>%           | 90                       | 44                 | 3<br>6.8%          | 0<br>-          | 46                     | 8<br>17.4%         | 7<br>15.2%      |
| <u>Ventura</u><br>%                | 82                       | 61                 | 0<br>-             | 0<br>-          | 21                     | 0<br>-             | 0<br>-          |
| <u>Kern</u><br>%                   | 14                       | 8                  | 0<br>-             | 0<br>-          | 6                      | 0<br>-             | 0<br>-          |
| <u>Inyo</u>                        | 3                        | -                  | -                  | -               | -                      | -                  | -               |

Note: percentages refer to cable and non-cable homes only, not percentages of total diaries.